



Put this in Hudson file 2-0196
New York State Department of Environmental Conservation

MEMORANDUM

TO:

FROM:

SUBJECT:

DATE:

Mr. Charles Goddard, Bureau of Management Programs, Division of Solid Waste Management
James D. Reid, P.E., Regional Engineer for Solid Waste, Region 2
Attached Information received on 11/2/78 Regarding Northeast Oil Services
owner of Newtown Refinery in Long Island City, New York
November 3, 1978

I am forwarding a copy of the original information sheet received on November 2, 1978 to this memorandum concerning certain alleged operations of Northeast Oil Services. These operations involve removal of phenol and tar contaminated wastewater from an industrial plant in New Jersey with transfer to Newtown Refinery and subsequent alleged irregular disposal measures suspected to be currently used.

When you have read the attached sheet, please contact me at your earliest convenience as to any comments that you may have.

cc: File ✓

Enclosure

324469



Recently, a disposal company that had been removing phenol- and tar-contaminated wastewater from an industrial plant in New Jersey stated that Northeast Oil Services, owner of the New Town Refinery on New Town Creek in Long Island City, New York, had recently taken over the disposal of the aforementioned waste. Additionally, information was relayed that new solid waste regulations had forced the disposal company that formerly took care of this waste to raise its prices, and this company was quite surprised when Northeast Oil Services offered to remove and dispose of this material at discount prices.

Northeast is trucking the material from the plant to their refinery location on New Town Creek and may be dumping the phenol-contaminated waters into the sewer. Apparently, New Town Refinery does not pre-treat for the removal of phenol and other contaminants from the wastewater stream before discharge to the sewer.

Recent information from the City of New York indicates that the New Town treatment plant has the highest concentration of contaminants in the New York City sewage treatment systems.

The oil content in the sewer sludge alone is in excess of 10 percent, where in most other areas in the City, there is less than 2 percent. There are also heavy concentrations of metal and other environmental contaminants. It is possible that a vast majority of these contaminants are being generated by Northeast and their New Town Refinery at New Town Creek.

RECEIVED

NYC SOLID WASTE DIVISION

APR 11 1971

SOLID WASTE

Robert F. Flacke

February 11, 1980

Mr. Kenneth Mansfield
Hudson Oil Refining Company
River Road
Edgewater, NJ

Dear Mr. Mansfield:

Hudson Oil Refining Company's 364 application - submitted on January 28, 1980 and February 4, 1980 - is incomplete.

In order to have a complete application, the following is needed:

1. SW-14 and Annual Report must be consistent. They are not. There are discrepancies of over two million gallons.
2. Your application ignores the fact that at least two waste streams come out of each plant; the largest stream consisting of filtered and dewatered waste oil and the other, the filtrate - sludge, dirt, stones, etc. For both these waste streams, we must have signature of receiving stations, etc. It will not be acceptable to just say that all waste goes to some out of state location and just forget it.
3. The outline of the corporate structure must be received in an acceptable form prior to the issuance of any permits. This outline will consist of a detailed breakdown of each and every corporation owned or controlled, directly or indirectly, by Russell Mahler, showing the exact relationship between all companies and also which companies operate what. The outline must be signed by Russell Mahler.

Please send the required information as soon as possible so your application can be processed quickly.

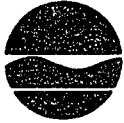
Sincerely,

David L. Archibald
Sanitary Engineer
Bureau of Hazardous Waste
Division of Solid Waste

RECEIVED
N.Y.C. DEPT. REGION 2
FEB 25 1980
SOLID WASTE

DLA:cl

cc: Mr. Drapeau
Mr. Gaddard



New York State Department of Environmental Conservation

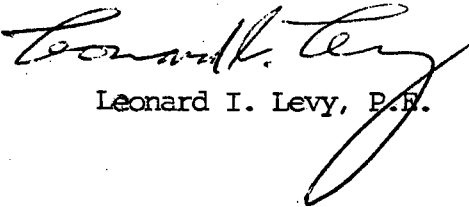
M E M O R A N D U M

TO: James Reid, P.E.
FROM: Leonard I. Levy, P.E.
SUBJECT: Inspection of Newtown Refining Corporation Site on January 30, 1980
DATE: February 6, 1980

Shortly after 11 A.M. on January 30, 1980, I and James Reid arrived at the Newtown Refining Corporation. An inspection of the premises revealed several interesting items:

1. We found Mike Abamonte (license plate no. 6367-PO, of 95-06 99 Avenue, Apt. 4A, Jamaica 11416) making an illegal delivery of waste oil. (Later, in the office, I filled out a form to initiate action against him.)
2. In one area, we observed steam emerging through various cracks and fissures in the asphalt pavement, strongly suggesting a steam line broken or badly corroded at several points, and a hazard.
3. At many locations throughout the site, there were puddles of an assortment of colors, as well as well as multicolored stains upon the ground, all indicating spillage of waste oil. The fire hazard therefrom was obvious.

Our brief inspection thus revealed three problems that seem to characterize the site: illegality (at least on the fringes), hazardous operation and sloppy housekeeping.


Leonard I. Levy, P.E.

cc: File

New York State Department of Environmental Conservation

M E M O R A N D U M

TO: Mr. James Reid, P.E., Regional Solid Waste Engineer, Region 2, N.Y.
FROM: Mr. Jerome Riordan, Asst. San. Engineer, Solid Waste Mngmt. Unit, Reg.
SUBJECT: Complaint Concerning Odorous Emissions from Oil Refining/ New York
Corp at 37-80 Review Avenue, L.I.C., New York 11101 (Newtown Plant)
DATE: September 27, 1979

On Wednesday, September 26, 1979 about noon Mr. J.G. McDermott, Environmental Conservation Officer, from Law Enforcement Region 2 and myself stopped at the Guinness-Harp Corporation located at 37-88 Review Avenue, Long Island City, New York.

We spoke with a Mr. Richard C. Mirra who told us of an odor that had been permeating the area of his concern and believed to originate from operations being conducted at the Newtown Plant of Hudson Oil Refinery Co. located beside the Guinness-Harp Corporation.

Mr. Mirra said the odor was such to cause people to become ill at this warehouse plant of Guinness-Harp and as a result request and seek permission to go home as a result of the inhalation of the odor.

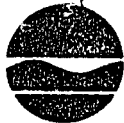
While at the Guinness-Harp plant, Mr. McDermott and I did experience an odor which seemed to emanate from the general direction of the Newtown facility. The odor experienced was not very intense but did vanish and reappear at times when we were present.

Later on in the late afternoon, we came back to Guinness-Harp and experienced the odor to a lesser degree than we did before noon.

Prior to our coming to this plant, Mr. McDermott and I had entered the Newtown facility and learned that samples had been taken by Mr. Pirzada from Air Resources the previous week.

According to Mr. Mirra, the intensity of the odor that we had experienced had been mild compared to what was normally experienced.

cc: File



New York State Department of Environmental Conservation

RECEIVED
 N.Y.S.D.E.C.-REGION 2

APR 30 1980

MEMORANDUM

SOLID WASTE

TO: Dick Brickwedde
 FROM: David L. Archibald & Bruce W. Knapp, Bureau of Hazardous Waste
 SUBJECT: Hudson Oil Refining Corp. *D.L.A. B.W.K.*

DATE: April 28, 1980

Returned to S.W. and
RECEIVED
Returned as of
 AUG 7 1980
 AUG 6 1980
SOLID WASTE
SOLID WASTE

After seeing for three months Hudson Oil's half-hearted attempts to convince the Department that they are trying to comply with Part 360, Part 364, and the Consent Order, we are convinced that Hudson realizes it is only a matter of time until they are closed down. This is the case in New Jersey. The State of New Jersey will "soon" be closing down the Edgewater facility according to the hazardous waste people in New Jersey's Environmental Protection Agency.

We believe that Hudson Oil Refining should be denied all permits in New York State and should be shut down completely as soon as possible.

The following is a summary of Hudson Oil Refining's lack of compliance with the Consent Order since January 21, 1980:

Section IV - All signs, trucks, contracts, etc., have not been changed to reflect the singular entity, namely Hudson Oil Refining Corp.

V - Applications have been received for 360 and 364 permits. The 360 applications are utterly and absolutely useless. They are totally inadequate. Their engineer does not have any idea how the facility operates. We believe that most of the so called "emulsified oil", which is in fact process waste water containing a tiny amount of emulsified oil, is being dumped into the sewer. The 364 applications are not complete because Hudson persists in not answering our questions relative to the corporate structure, disposal of sludge, and the disposition of the burnable residue which they refer to as their "product".

We understand they have no air or water discharge permits and assume that they have been as evasive with Air and Water as with Hazardous Waste.

X - The order mentions the fact that Hudson is allowed to transport and receive emulsified oil among others provided the waste is compatible with the treatment process. The waste is not compatible with the treatment process due to the fact that Hudson has consistently (for four years) evaded our questions about exactly what the treatment process is.

XI - Hudson Oil has received and is continuing to receive mixtures of oil and non-chlorinated solvents and other wastes not specifically approved in writing by the Department. This is specifically not allowed but has been done anyway.

- XII - No manifests have been received from the Syracuse facility and only about 10% of the manifests have been received within 48 hours as required.
- XIII - The 360 applications were not submitted by February 21, 1980 as required by the Order.
- XIV - Hudson has not submitted the required form 47-19-7 for most wastes being received at the Long Island City facility or for any wastes being received at the Syracuse facility. They continue to receive wastes from other states as well as from New York State.
- XV - No monthly reports have been submitted. This is the fault of the Department.
- XVIII - The SPCC for each plant is ill-conceived and inadequate.
- XIX - The required plans have not been received.
- XX - Several very carefully worded letters have been received from Russell Mahler. These letters very very carefully avoid answering the questions posed by the Department and with few exceptions do not give us the slightest shred of information which we do not already have.

DLA/BWK:cl

cc: N. Drapeau
C. Goddard
J. Greenthal
L. Vernon
J. Reid
L. Gross
S. Kearing

STATE OF NEW YORK : DEPARTMENT OF ENVIRONMENTAL CONSERVATION

-----X

In the Matter of Alleged Violations of Sections 17-0803, 27-0301, 27-0707 and Article 19 of the Environmental Conservation Law and Parts 201, 211, 212, 360, 364 and 751 of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York by

CONSENT
ORDER

HUDSON OIL REFINING CORPORATION
Edgewater, New Jersey,

CASE NO.
7-0198

Respondent.

-----X

WHEREAS:

Pursuant to Sections 17-0809, 19-0301, 27-0301 and 27-0703 of the Environmental Conservation Law of the State of New York, standards were promulgated for controlling the discharge of pollutants to the waters of the State, air contamination within the State, and the removal and/or disposal of solid and/or liquid wastes within the State, and these standards are filed in the Office of the Secretary of State and compiled as Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York, Chapter III Subchapter A, Chapter IV Subchapter B and Chapter X Subchapter A thereof, and

The Respondent owns and/or operates a business and facilities within the State of New York which transport and process waste oils and admixtures thereof, and

investigations having been conducted by the Department of Environmental Conservation (hereinafter referred to as "Department") and its representatives, and representatives of other environmental and/or law enforcement agencies, of the operations of the Respondent, and

Based upon such investigations, it has been found that Respondent has operated and maintained its business and facilities in a manner not in conformity with the Environmental Conservation Law, to wit., in the past the Respondent has:

a) been cited on at least sixteen different occasions by representatives of the Department for violations of its various permits and/or the Environmental Conservation Law.

b) hauled waste materials which were outside the scope of the provisions of permits issued to Respondent, including but not limited to, Carrier Corp. in Syracuse, New York, Clairol Corp. in Connecticut, and Pratt and Whitney Corp. in Montreal, Canada.

c) disposed of various waste streams in the sewers of the County of Onondaga, New York.

Respondent having affirmatively waived its right to a hearing herein as provided by law and consented to the issuing and entering of this Order and agreed to be bound by the provisions, terms and conditions contained herein.

NOW, having considered this matter, and being duly advised, IT IS ORDERED:

I. THAT, due to the violations of the Environmental Conservation Law, as hereinabove stated, the Respondent is hereby assessed a civil penalty of FIFTY THOUSAND DOLLARS (\$50,000.00), payment of which shall be made to the Department within seven (7) days of the effective date of this Order, by presenting said sum to the Compliance Counsel of the Department in Room 608 of the Department's offices at 50 Wolf Road, Albany, New York 12233.

11. THAT, to insure timely compliance with the provisions, terms and conditions of this Order, any and all permits issued by the Department, and the Environmental Conservation Law, Respondent shall within fourteen (14) days of the effective date of this Order, post or deposit with the Department a financial undertaking in cash, check or other negotiable instrument, in acceptable form, or a surety bond issued by a company licensed to do business in the State of New York in a form acceptable to the Department, in the amount of TWO HUNDRED AND FIFTY THOUSAND DOLLARS (\$250,000.00), payable to the Commissioner of Environmental Conservation upon condition that upon ten (10) days written notice to the Respondent, said financial undertaking shall be forfeited and paid to the Commissioner if at any time the Respondent fails to comply with any or all of the provisions, terms and conditions of this Order or any permit issued to the Respondent; provided however that the Respondent has not requested in writing and been granted a prior written formal modification of said provisions, terms and conditions by the Commissioner; and provided further, that the forfeiture or payment of said amount shall in no way prejudice the right of the Commissioner to institute such other and further action as he may deem necessary in order to insure full compliance with the provisions, terms and conditions of this Order, any and all permits issued to Respondent and the Environmental Conservation Law. Should Respondent comply fully with the provisions, terms and conditions of this Order, then in that event, and in that event only, the necessity for the continuance of the cash, check, negotiable instrument or surety bond as the case may be, shall cease on March 31, 1982. Otherwise the necessity for said cash, check, negotiable instrument, or surety bond, as the case may be, shall continue on, until modified by the Department.

III. THAT, on and after the effective date of this Order, the operation and maintenance of the Long Island City and Syracuse operations by the Respondent, including all past violations of law by Respondent, shall constitute a continuing violation of the Environmental Conservation Law, except that the Department will not commence any action for penalties for such violations pursuant to law for so long as the Respondent commences and completes the environmental program contained in the provisions, terms and conditions of this Order, and remain in full compliance with the provisions, terms and conditions of this Order.

IV. THAT, notwithstanding previous designations by the Respondent of its Long Island City, New York facility and appurtenant operations as Newtown Oil and its Syracuse, New York facility and appurtenant operations as Northeast Oil Services, effective immediately, all permit applications and any possible permits issued pursuant thereto shall refer to said facilities and appurtenant operations as the Hudson Oil Refining Corporation, Long Island City and Syracuse operations respectively. All signs, trucks, contracts, etc. shall be changed to reflect this singular entity.

V. THAT, in so far as is practicable, and except as may be indicated specifically contrary within this Order, pursuant to Article 70 of the Environmental Conservation Law (Uniform Procedures Act), all applications shall be submitted simultaneously and shall be processed as a single project according to the provisions of said Article 70. Unless the Respondent can obtain all its necessary permits for both its Long Island City and Syracuse operations (6NYCRR Part 360 (hereinafter referred to by Part

umber) permit for hazardous waste disposal facility, Part 212 permits for process emissions, any Part 751 wastewater discharge permits that may be necessary and whatever Part 364 permits for industrial waste haulage) the Respondent's entire operation at both sites and its hauling shall cease until such time that said necessary permits are obtained. If any said necessary permit application is denied, all issued permits are deemed suspended until such time that Respondent obtains the necessary permit which was denied. This Order shall be deemed to grant the Respondent temporary authority to operate its Long Island City and Syracuse operations until such time that the Respondent's applications for permits are granted or denied, or until such time that environmental conditions warrant a shut down of such operations.

VI. THAT, the Respondent shall not receive any waste materials from haulers which are not registered pursuant to Part 364 to haul wastes to the specific facility receiving the waste. Nor shall Respondent deliver or ship any waste to any receiving station not listed on its or any hauler's certificate of registration.

VII. THAT, as regards the Respondent and a certificate of registration pursuant to Part 364, Respondent shall submit a single complete application for a certificate of registration for the entire operation.

VIII. THAT, a copy of this Order must be attached to the certificate of registration issued to the Respondent, and a copy of the certificate and the Order must be physically located in each vehicle owned or operated by the Respondent that transports wastes in New York State.

IX. THAT, "waste", for the purpose of this Order, shall mean materials or substances discarded or rejected as being spent, useless, worthless, contaminated, or in excess to the generator or owner at the time of such discard or rejection. Such wastes shall include but not be limited to septic tank waste, portable toilet waste, sewage treatment plant sludge, ashes, slag, incinerator residue, street cleanings, agricultural waste, industrial waste, commercial waste, sludges, slurries, oils, acids, alkalis, spent chemicals, solvents, waste water, lime, catalysts and flyash.

X. THAT, the only wastes that Respondent may transport within New York State and/or receive at its facilities at Long Island City and Syracuse are the following:

- a) Automotive crankcase oil from service establishments as described in Article 23, Title 23 of the Environmental Conservation Law.
- b) Non-PCB lubricating and/or hydraulic oil.
- c) Distressed oil.
- d) Contaminated fuel oil.
- e) Emulsified and non-emulsified cutting oil.
- f) Waste streams specifically approved in writing by the Department.

These above wastes must be compatible with the treatment processes used at the Long Island City and Syracuse operations, and should these processes change materially subsequent to the issuance of any permit, so as to affect treatment, the Department reserves the right to modify any or all permits or this Order accordingly.

XI. THAT, the Respondent's Long Island City and Syracuse operations shall, UNDER NO CIRCUMSTANCES (emphasis added), receive the following waste materials:

- a) Halogenated solvents and other wastes contaminated with same.
- b) Mixtures of oil and non-chlorinated solvents.
- c) PCB's.
- d) Anything not specifically approved as listed above in paragraph X or as may be approved in writing by the Department.

XII. THAT, any vehicle owned or operated by the Respondent, hauling waste materials must have at all times in the vehicle, in addition to a copy of the certificate of registration and this Order, a manifest, (see appendix A, annexed hereto) which is signed by the waste generator and also signed by the driver, giving a date and time of pickup of the load. In the case of a truck picking up only waste automotive crankcase oil, the manifest must be signed only by the driver giving the date and time of the pickup. Upon delivering the waste to a receiving station, the driver must sign the manifest again, giving the date and time of arrival at the receiving station. At the time of arrival, the manifest must be give to the receiving station operator, who must sign it and date it, and send one copy to the Bureau of Hazardous Waste, New York State Department of Environmental Conservation, 50 Wolf Road, Albany, New York 12233, within forty-eight (48) hours of receipt of the manifest.

This condition also applies to All (emphasis added) handlers of waste materials transporting wastes from either the Long Island City or Syracuse operations, in which case the Respondent shall be considered the generator.

XIII. THAT, the Respondent shall submit to the Department, within one month of the effective date of this Order, an application for the Syracuse operation, to operate said facilities pursuant to Part 360, as per the Guidelines in Appendix B (annexed hereto). As to the Long Island City operation, the Respondent shall submit within one month from the effective date of this Order, the additional information outlined in Appendix C (annexed hereto) as part of its pending application to operate a solid waste management facility pursuant to Part 360. Respondent shall respond to any and all reasonable requests for information within a period of time acceptable to the Department. In the event that either or both Part 360 permits is denied, the facility denied is thereafter prohibited from receiving or treating any waste.

XIV. THAT, the Respondent shall receive only wastes for which it has received prior written approval from the Department. This approval is dependent upon the Respondent completing and submitting to the Department Form 47-19-7, "Application for Treatment or Disposal of an Industrial or Hazardous Waste Stream", for each and every waste that it intends to receive at either the Long Island City or Syracuse operation (other than waste crankcase oil from service establishments as defined in Article 23, Title 23 of the Environmental Conservation Law). Form 47-19-7 to be signed by each

ate generator and shall be submitted to the Department at least three weeks prior to the intended receipt of said waste stream.

In addition thereto, all materials hauled from the Long Island City and Syracuse operations shall require prior written approval from the Department. Application to haul these materials from each operation shall be on forms provided by the Department and shall be completed for each and every type of material and for each and every facility receiving said material.

XV. Monthly reports shall be submitted by the Respondent to the Department's Bureau of Hazardous Wastes on forms provided by the Department. These forms shall be completed in a manner specified and acceptable to the Department. The information on these forms shall include but not be limited to:

a) Nature and quantity of wastes accepted from each and every generator at each the Long Island City and Syracuse operation.

b) The name and address of every hauler which has transported waste to each the Long Island City and Syracuse operation.

c) Testing results for incoming wastes, other than waste crankcase oil from service establishments as defined in Article 23, Title 23 of the Environmental Conservation Law and for all shipments of materials leaving each the Long Island City and Syracuse operation. Said results are to include but not be limited to lead and sulfides. In addition, for each

shipment of materials leaving each plant, an analysis for Poly chlorinated benols (PCB's) shall be performed, and these results shall be reported as well. For purposes of this paragraph, shipment shall mean a uniform batch of material in quantity up to the volume of the tank in which it is stored. No material may be added to a tank after the sample has been taken.

All samples shall be analyzed by a laboratory certified by the State of New York and acceptable to the Department.

XVI. THAT, the Respondent shall complete an AIR 100 form for each air emission point at the Long Island City and Syracuse operations and submit same as directed by the Department. Each operation shall be conducted in such a fashion that odor violations do not occur.

XVII. THAT, discharges to the sewers at the Long Island City and Syracuse operations will be subject to limitations to be specified by the Department. Furthermore, each sewer outfall at Long Island City and Syracuse shall have continuous monitoring equipment for each and every discharge to sewer lines, surface waters and groundwaters. Detailed plans and reports shall be submitted to the Department for approval for each monitoring station within one (1) month of the effective date of this Order. Each monitoring station is to be protected by locks furnished by the Department. In addition, a split sampling program will be conducted by the Department to monitor any discharge.

XVIII. THAT, the Respondent shall prepare a Spill Prevention Control and Countermeasure Plan (SPCC) for the Long Island City and Syracuse operations, as defined in Section 311 of the Clean Water Act, and said plans shall meet Departmental approval.

- 1 -

XIX. THAT, plans of the Long Island City and Syracuse operations showing the exact location of all tanks, pipes, pipe valves, pipe joints, manholes, access ports, surface drainage ditches, sewer lines, storm sewers, storm drains, buildings and other similar items shall be submitted to the Department within one (1) month of the effective date of this Order. These plans shall include all active and abandoned items. Both above ground and below ground structures shall be shown as well as flow direction. These plans shall include plot plans and the plan and elevation views showing the above. A report specifying the use and materials of construction of each and every tank and pipe shall be submitted with said plans. The reports and plans shall be prepared by a Professional Engineer licensed by the State of New York. With these plans and reports, the Respondent shall submit a signed and notarized certification attesting to the fact that the plans and reports accurately show all existing tanks, pipes and other structures specified in this item.

XX. THAT, the Respondent shall submit to the Department within fifteen (15) days of the effective date of this Order, an accurate and complete outline of the structure of the corporate holdings of Russell Mahler and Hudson Oil Refining Corporation. This shall include all companies or operations owned or controlled by Russell Mahler and Hudson Oil Refining Corporation, whether or not these companies or operations conduct any business within the State of New York. Said submission shall meet Departmental approval.

XXI. THAT, for the purpose of insuring compliance with this Order, duly authorized representatives of the Department shall be permitted access to the Long Island City and Syracuse operations and all vehicles owned or operated by the Respondent and all books and records contained therein or as may relate thereto but deposited off site.

XXII. THAT, no change in this Order shall be made or be effective except upon written application by the Respondent or after administrative hearing at which Respondent shall have all rights as provided by law.

XXIII. THAT, the provisions, terms and conditions of this Order shall be deemed to bind the Respondent, and its agents, servants, employees, successors and assigns and all persons, firms and corporations acting under or for it, including but not limited to those who may carry on any or all of the operations now being conducted by the Respondent, whether at the present locations or at any other location in the State of New York, or who shall have any interest, financial or otherwise, in the conduct of such operations.

SEE ADDENDUM

DATED: Albany, New York

Jan. 21

1979-825

ROBERT F. FLACKE, COMMISSIONER
New York State Department of
Environmental Conservation

BY

[Signature]
Richard A. Persico
General Counsel/
Deputy Commissioner

TO: Mr. Russell Mahler
President
Hudson Oil Refining Corporation
1 River Road
Edgewater, New Jersey 07020

CONSENT OF RESPONDENT

Respondent hereby consents to the issuing and entering of the foregoing Order without further notice and waives its rights to a hearing herein and agrees to be bound by the provisions, terms and conditions contained therein.

HUDSON OIL REFINING CORPORATION

BY Russell W. Mahler
TITLE President
DATE Jan. 18, 1980

CORPORATE ACKNOWLEDGEMENT

STATE OF New York
COUNTY OF New York } SS:

On this 18th of JANUARY 1980, before me personally came RUSSELL W. MAHLER to me known, who being by me duly sworn, did depose and say that he resides at 106DEN ROAD, New Canaan, CT that he is the PRESIDENT of HUDSON OIL REFINING CORPORATION the corporation described in and which executed the foregoing instrument, and that he signed his name as authorized by said corporation.

Kathryn A. Albertelli
NOTARY PUBLIC

KATHRYN A. ALBERTELLI
NOTARY PUBLIC, State of New York
Qualified in Queens County
Commission Expires March 30, 1981

ADDENDUM TO CONSENT ORDER

XXIV. Except as otherwise provided in this Order, the Department shall process all applications for permits submitted to it by Respondent in accordance with the provisions of Article 70 of the Environmental Conservation Law ("Uniform Procedures Act") and Part 621.